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December 3, 2014

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Imperial Western Products
Vincent R. Whittaker
Agent for Service of Process
74900 Highway 111, Ste. 224
Indian Wells, CA 92210

Imperial Western Products
Bill Trawick, CEO
P.O. Box 1110
Coachella, CA 92236

Imperial Western Products
Joseph Gravanda, Facility Operator
P.O. Box 1110
Coachella, CA 92236

RE: Notice Of Violations And Intent To File Suit Under The Federal Water Pollution Control Act Concerning Imperial Western Products, 4085 Bain St., Mira Loma, California, WDID No. 8 331022367

Dear Mr. Whittaker, Mr. Trawick and Mr. Gravanda,

The Law Office of Gideon Kracov (hereinafter "**Office**") on behalf of the Center for Community Action and Environmental Justice (hereinafter "**CCA EJ**") is contacting you concerning Clean Water Act (hereinafter "**CWA**" or "**Act**") violations at the Imperial Western Products facility at 4085 Bain St., Mira Loma, California (hereinafter "**Facility**"). This letter is being sent to you, the Imperial Western Products, Vincent R. Whittaker, Bill Trawick and Joseph Gravanda, as the responsible owners, officers, or operators of the Facility (collectively hereinafter "**Imperial Western**").

CCA EJ is a non-profit public benefit corporation in Jurupa Valley dedicated to working with communities to advocate for environmental justice and pollution prevention. CCA EJ has members living in the community adjacent to the Facility and the Santa Ana River Watershed. CCA EJ and its members are deeply concerned with protecting the environment in and around their communities, including the Santa Ana River Watershed.

This letter addresses Imperial Western's unlawful discharge of pollutants from the Facility through the Riverside municipal storm sewer system into San Sevaine Channel and then into the Santa Ana River. The Facility is discharging storm water pursuant to National Pollutant Discharge Elimination System (hereinafter "NPDES") Permit No. CA S000001, California State Water Resources Control Board (hereinafter "State Board") Order No. 92-12-DWQ as amended by Order No. 97-03-DWQ (hereinafter "General Permit").¹ The WDID identification number for the Facility listed on documents submitted to the California Regional Water Quality Control Board, Santa Ana Region ("Regional Board") is 8 33I022367. The Facility is engaged in ongoing violations of the substantive and procedural requirements of the General Permit.

Section 505(b) of the CWA requires a citizen to give notice of intent to file suit sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Act (33 U.S.C. § 1365(a)). Notice must be given to the alleged violator, the U.S. Environmental Protection Agency (hereinafter "EPA"), and the State in which the violations occur.

As required by the Act, this Notice of Violation and Intent to File Suit provides notice of the violations that have occurred, and continue to occur, at the Facility. Consequently, Imperial Western is hereby placed on formal notice by CCAEJ that, after the expiration of sixty days from the date of this Notice of Violations and Intent to Sue, CCAEJ intends to file suit in federal court against Imperial Western under Section 505(a) of the Clean Water Act (33 U.S.C. § 1365(a)), for violations of the CWA and General Permit. These violations are described more extensively below.

I. BACKGROUND.

Imperial Western filed a Notice of Intent to Comply With the Terms of the General Permit to Discharge Storm Water Associated with Industrial Activity (hereinafter "NOI") and that NOI can be viewed on the State of California's State Water Resources Control Board website. In its NOI, Imperial Western certified that the Facility is classified under SIC Code 2048 (Grain Mills Products). Imperial Western provides products and services to the livestock feed, biodiesel, industrial and manufacturing industries. It also offers onsite removal services for residual bakery goods and food byproducts. On information and belief, CCAEJ alleges that the Facility collects and discharges storm water from its industrial site into one or more storm drain outfalls located at the Facility. The outfalls discharge into the Riverside County municipal storm sewer system, which flow into San Sevaine Channel and then flow into the Santa Ana River.

¹ On April 1, 2014, the State Board reissued the General Permit, continuing its mandate that industrial facilities implement the best available technology economically achievable ("BAT") and best conventional pollutant control technology ("BCT") and, in addition, establishing numeric action levels mandating additional pollution control efforts. State Board Order 2014-0057-DWQ. The new permit, however, does not go into effect until July 1, 2015. Until that time, the current General Permit remains in full force and effect.

The Regional Board has identified beneficial uses of the Santa Ana River Watershed and established water quality standards for the river and its tributaries in “The Water Quality Control Plan (Basin Plan) for the Santa Ana River Basin” (hereinafter “**Basin Plan**”). See California Regional Water Quality Control Board, Santa Ana Region, The Water Quality Control Plan (Basin Plan) for the Santa Ana River Basin (2011), available at http://www.swrcb.ca.gov/rwqcb8/water_issues/programs/basin_plan/index.shtml.

The beneficial uses of these waters include, among others, municipal and domestic supply, agricultural supply, groundwater recharge, water contact recreation, non-contact water recreation, warm freshwater habitat, cold freshwater habitat, and wildlife habitat. The non-contact water recreation use is defined as “[u]ses of water for recreational activities involving proximity to water, but not normally involving contact with water where water ingestion is reasonably possible.” *Id.* at 3-3. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.” *Id.* Contact recreation use includes fishing and wading. *Id.* at 3-2. Visible pollution, including visible sheens and cloudy or muddy water from industrial areas, impairs people’s use of the Santa Ana River for contact and non-contact water recreation.

The Basin Plan includes a narrative toxicity standard which states that “[t]oxic substances shall not be discharged at levels that will bioaccumulate in aquatic resources to levels which are harmful to human health.” *Id.* at 4-18. The Basin Plan includes a narrative oil and grease standard which states that “[w]aste discharges shall not result in deposition of oil, grease, wax, or other material in concentrations which result in a visible film or in coating objects in the water, or which cause a nuisance or adversely affect beneficial uses.” *Id.* at 4-15. The Basin Plan includes a narrative suspended and settleable solids standard which states that “waters shall not contain suspended or settleable solids in amounts which cause a nuisance or adversely affect beneficial uses” *Id.* at 4-16. The Basin Plan includes a narrative floatables standard which states that “[w]aste discharges shall not contain floating materials, including solids, liquids, foam or scum, which cause a nuisance or adversely affect beneficial uses.” *Id.* at 4-11. The Basin Plan includes a narrative color standard which states that “[w]aste discharges shall not result in coloration of the receiving waters which causes a nuisance or adversely affect beneficial uses.” *Id.* at 4-10. The Basin Plan includes a narrative turbidity standard which states that “inland surface waters . . . shall be free of changes in turbidity which adversely affect beneficial uses. *Id.* at 4-18. The Basin Plan provides that “the pH of inland surface waters shall not be raised above 8.5 or depressed below 6.5...” *Id.* at 4-15. The Basin Plan also includes a Nitrate standard of 10 mg/L as Nitrogen. *Id.* at 4-14.

The EPA has published benchmark levels as guidelines for determining whether a facility discharging industrial storm water has implemented the requisite best available technology

economically achievable (hereinafter “BAT”) and best conventional pollutant control technology (hereinafter “BCT”).² The following benchmarks have been established for pollutants discharged by Imperial Western: Total Suspended Solids (“TSS”) – 100 mg/L, pH – 6-9 s.u., oil and grease (“O&G”) – 15.0 mg/L, Total Organic Carbon (“TOC”) – 110 mg/L, Chemical Oxygen Demand (“COD”) – 120 mg/L. U.S. Environmental Protection Agency, Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (2009) 52 (hereinafter “MSGP”).

II. ALLEGED VIOLATIONS OF THE NPDES PERMIT.

a. Discharges In Violation Of The Permit Not Subjected To BAT/BCT.

Imperial Western has violated and continues to violate the terms and conditions of the General Permit. Section 402(p) of the Act prohibits the discharge of storm water associated with industrial activities, except as permitted under an NPDES permit (33 U.S.C. § 1342) such as the General Permit. The General Permit prohibits any discharges of storm water associated with industrial activities or authorized non-storm water discharges that have not been subjected to BAT or BCT. Effluent Limitation B(3) of the General Permit requires dischargers to reduce or prevent pollutants in their storm water discharges through implementation of BAT for toxic and nonconventional pollutants and BCT for conventional pollutants. BAT and BCT include both nonstructural and structural measures. General Permit, Section A(8). Conventional pollutants are Total Suspended Solids, Oil and Grease, pH, Biochemical Oxygen Demand, and Fecal Coliform. 40 C.F.R. § 401.16. All other pollutants are either toxic or nonconventional. *Id.* §§ 401.15, 401.16.

In addition, Discharge Prohibition A(1) of the General Permit prohibits the discharge of materials other than storm water (defined as non-storm water discharges) that discharge either directly or indirectly to waters of the United States. Discharge Prohibition A(2) of the General Permit prohibits storm water discharges and authorized non-storm water discharges that cause or threaten to cause pollution, contamination, or nuisance.

Receiving Water Limitation C(1) of the General Permit prohibits storm water discharges and authorized non-storm water discharges to surface or groundwater that adversely impact human health or the environment. Receiving Water Limitation C(2) of the General Permit also prohibits storm water discharges and authorized non-storm water discharges that cause or contribute to an exceedance of any applicable water quality standards contained in a Statewide Water Quality Control Plan or the applicable Regional Board’s Basin Plan. The General Permit does not authorize the application of any mixing zones for complying with Receiving Water

² The Benchmark Values can be found at:

http://www.epa.gov/npdes/pubs/msgp2008_finalpermit.pdf and

<http://cwea.org/p3s/documents/multi-sectorrev.pdf> (Last accessed on December 2, 2014).

Limitation C(2). As a result, compliance with this provision is measured at the Facility's discharge monitoring locations.

Imperial Western has discharged and continues to discharge storm water with unacceptable levels of TSS, pH, O&G, COD, N+N and other pollutants in violation of the General Permit. Imperial Western's sampling and analysis results reported to the Regional Board confirm discharges of specific pollutants and materials other than storm water in violation of the Permit provisions listed above. Self-monitoring reports under the Permit are deemed "conclusive evidence of an exceedance of a permit limitation." *Sierra Club v. Union Oil*, 813 F.2d 1480, 1493 (9th Cir. 1988).

The following discharges of pollutants from the Facility contained concentrations of pollutants in excess of numeric water quality standards established in the Basin Plan, evidencing past and ongoing violations of General Permit Discharge Prohibitions A(1) and A(2), Effluent Limitation B(3) and Receiving Water Limitations C(1) and C(2).

Date	Parameter	Observed Concentration	Basin Plan or EPA Water Quality Standard	Outfall (as identified by the Facility)
2/28/2014	pH	4.7 s.u.	6.5-8.5 s.u.	SE Corner
1/25/2013	pH	5.0 mg/L	6.5-8.5 s.u.	SE Corner
12/12/2011	pH	4.8 s.u.	6.5-8.5 s.u.	SE Corner

The information in the above table reflects data gathered from Imperial Western's self-monitoring during the 2011-2012, 2012-2013 and 2013-2014 wet seasons. CCAEJ alleges that during each of these wet seasons and continuing through today, Imperial Western has discharged storm water contaminated with pollutants at levels or observations that exceed or violate the applicable water quality standard for pH – 6.5 – 8.5 s.u. (Basin Plan).

The following discharges of pollutants from the Facility contained concentrations of pollutants in excess of numeric water quality benchmarks established by EPA in the MGSP ("EPA Benchmarks"), evidencing past and ongoing violations of General Permit Discharge Prohibitions A(1) and A(2), Effluent Limitation B(3) and Receiving Water Limitations C(1) and C(2).

Date	Parameter	Observed Concentration	EPA Benchmarks	Location (as identified by the Facility)
2/28/2014	pH	4.7 s.u.	6-9 s.u.	SE Corner
1/25/2013	pH	5.0 mg/L	6-9 s.u.	SE Corner
12/12/2011	pH	4.8 s.u.	6-9 s.u.	SE Corner
2/28/2014	TSS	140 mg/L	100 mg/L	SE Corner
1/25/2013	TSS	680 mg/L	100 mg/L	SE Corner
12/12/2011	TSS	440 mg/L	100 mg/L	SE Corner
2/28/2014	O&G	39 mg/L	15 mg/L	SE Corner
1/25/2013	O&G	41 mg/L	15 mg/L	SE Corner
1/25/2013	TOC	>390 mg/L	110 mg/L	SE Corner
12/12/2011	TOC	330 mg/L	110 mg/L	SE Corner
2/28/2014	COD	1100 mg/L	120 mg/L	SE Corner
1/25/2013	COD	1300 mg/L	120 mg/L	SE Corner

2/28/2014	N+N	1.13 mg/L	0.68 mg/L	SE Corner
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The information in the above table reflects data gathered from Imperial Western's self-monitoring during the 2011-2012, 2012-2013 and 2013-2014 wet seasons. CCAEJ alleges that during each of those rainy seasons and continuing through today, Imperial Western has discharged storm water contaminated with pollutants that exceed one or more applicable EPA Benchmarks, including, but not limited to, each of the following:

- o pH – 6-9 s.u.;
- o Total Suspended Solids – 100 mg/L;
- o O&G – 15 mg/L;
- o TOC – 110 mg/L;
- o COD – 120 mg/L;
- o N+N – 0.68 mg/L.

CCAIEJ's investigation, including its review of Imperial Western's analytical results documenting pollutant levels in the Facility's storm water discharges well in excess of applicable water quality standards and the EPA's benchmark values, indicate that Imperial Western has not implemented BAT and BCT at the facility for its discharges of pH, TSS, O&G, TOC, COD, N+N and other pollutants in violation of Effluent Limitation B(3) of the General Permit. Imperial Western was required to have implemented BAT and BCT by no later than October 1, 1992, or since the date the Facility opened. Thus, Imperial Western is discharging polluted storm water associated with its industrial operations without having implemented BAT and BCT.

In addition, the numbers listed in the table above indicate that the Facility is discharging polluted storm water in violation of Discharge Prohibitions A(1) and A(2) and Receiving Water Limitations C(1) and C(2) of the General Permit. CCAIEJ alleges that such violations also have occurred and will occur on other rain dates, including every significant rain event that has occurred since at least December 3, 2009 and that will occur at the Facility subsequent to the date of this Notice of Violation and Intent to File Suit. Attachment A, attached hereto, sets forth each of the specific rain dates on which CCAIEJ alleges that Imperial Western has discharged storm water containing impermissible levels of pH, TSS, O&G, TOC, COD, N+N and other

pollutants in violation of Effluent Limitation B(3), Discharge Prohibitions A(1) and A(2) and Receiving Water Limitations C(1) and C(2) of the General Permit.³

These unlawful discharges from the Facility are ongoing. Each discharge of storm water containing any of these pollutants constitutes a separate violation of the General Permit and the Act. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the CWA, Imperial Western is subject to penalties for violations of the General Permit and the Act since December 3, 2009.

b. Failure To Develop And Implement An Adequate Monitoring And Reporting Program.

Section B of the General Permit describes the monitoring requirements for storm water and non-storm water discharges. Facilities are required to make monthly visual observations of storm water discharges (Section B(4)) and quarterly visual observations of both unauthorized and authorized non-storm water discharges (Section B(3)). Section B(5) requires facility operators to sample and analyze at least two storm water discharges from all storm water discharge locations during each wet season. Section B(7) requires that the visual observations and samples must represent the “quality and quantity of the facility’s storm water discharges from the storm event.”

The above-referenced data was obtained from the Facility’s monitoring program as reported in its Annual Reports submitted to the Regional Board. This data is evidence that the Facility has violated various Discharge Prohibitions, Receiving Water Limitations, and Effluent Limitations in the General Permit. To the extent the storm water data collected by Imperial Western is not representative of the quality of the Facility’s various storm water discharges and that the Facility failed to monitor all qualifying storm water discharges, CCAEJ alleges that the Facility’s monitoring program violates Sections B(3), (4), (5) and (7) of the General Permit.

CCAIEJ alleges on information and belief that Imperial Western failed to conduct visual observations in March 2012, February 2014 claiming that there were no qualifying rain events when in fact there were numerous such events during these periods.

³ The rain dates are all the days when an average of 0.1 or more rain fell as measured by a weather station located in Riverside. Data from the weather station is available at <http://www.ipm.ucanr.edu/WEATHER/SITES/riverside.html> (Last accessed on December 3, 2014). The rain dates also include days when the Facility reported a discharge in its Annual Reports.

The above violations are ongoing. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, Imperial Western is subject to penalties for violations of the General Permit and the Act's monitoring and sampling requirements since December 3, 2009.

c. Failure To Prepare, Implement, Review and Update An Adequate Storm Water Pollution Prevention Plan.

Section A and Provision E(2) of the General Industrial Storm Water Permit require dischargers of storm water associated with industrial activity to develop, implement, and update an adequate storm water pollution prevention plan (hereinafter "SWPPP") no later than October 1, 1992. Section A(1) and Provision E(2) requires dischargers who submitted an NOI pursuant to the General Permit to continue following their existing SWPPP and implement any necessary revisions to their SWPPP in a timely manner, but in any case, no later than August 1, 1997.

The SWPPP must, among other requirements, identify and evaluate sources of pollutants associated with industrial activities that may affect the quality of storm and non-storm water discharges from the facility and identify and implement site-specific best management practices (hereinafter "BMPs") to reduce or prevent pollutants associated with industrial activities in storm water and authorized non-storm water discharges (General Permit, Section A(2)). The SWPPP must include BMPs that achieve BAT and BCT (Effluent Limitation B(3)). The SWPPP must include: a description of individuals and their responsibilities for developing and implementing the SWPPP (General Permit, Section A(3)); a site map showing the facility boundaries, storm water drainage areas with flow pattern and nearby water bodies, the location of the storm water collection, conveyance and discharge system, structural control measures, impervious areas, areas of actual and potential pollutant contact, and areas of industrial activity (General Permit, Section A(4)); a list of significant materials handled and stored at the site (General Permit, Section A(5)); a description of potential pollutant sources including industrial processes, material handling and storage areas, dust and particulate generating activities, a description of significant spills and leaks, a list of all non-storm water discharges and their sources, and a description of locations where soil erosion may occur (General Permit, Section A(6)).

The SWPPP also must include an assessment of potential pollutant sources at the Facility and a description of the BMPs to be implemented at the Facility that will reduce or prevent pollutants in storm water discharges and authorized non-storm water discharges, including structural BMPs where non-structural BMPs are not effective (General Permit, Section A(7), (8)). The SWPPP must be evaluated to ensure effectiveness and must be revised where necessary (General Permit, Section A(9),(10)). The SWPPP must also include a certification statement and signature (General Permit, Section C(10)).

CCAIEJ's investigation of the conditions at the Facility as well as Imperial Western's Annual Reports indicate that Imperial Western has been operating with an inadequately developed SWPPP in violation of the requirements set forth above. Imperial Western has failed to evaluate the effectiveness of its BMPs and to revise its SWPPP as necessary. Imperial Western has been in continuous violation of Section A and Provision E(2) of the General Permit every day since December 3, 2009, at the very latest, and will continue to be in violation every day that Imperial Western fails to prepare, implement, review, and update an effective SWPPP. Imperial Western is subject to penalties for violations of the Order and the Act occurring since December 3, 2009.

d. Failure To File True And Correct Annual Reports.

Section B(14) of the General Industrial Storm Water Permit requires dischargers to submit an Annual Report by July 1st of each year to the executive officer of the relevant Regional Board. The Annual Report must be signed and certified by an appropriate corporate officer. General Permit, Sections B(14), C(9), C(10). Section A(9)(d) of the General Industrial Storm Water Permit requires the discharger to include in their annual report an evaluation of their storm water controls, including certifying compliance with the General Industrial Storm Water Permit. *See also* General Permit, Sections C(9) and (10) and B(14).

During the 2011-2012, 2012-2013, and 2013-2014 wet seasons, Imperial Western inaccurately certified in the Annual Report that the facility was in compliance with the General Permit. Consequently, Imperial Western has violated Sections A(9)(d), B(14), C(9) and C(10) of the General Industrial Storm Water Permit every time Imperial Western failed to submit a complete or correct report and every time Imperial Western or its agents failed to comply with the Act. Imperial Western is subject to penalties for violations of Section (C) of the General Industrial Storm Water Permit and the Act occurring since December 3, 2009.

III. Persons Responsible For the Violations.

CCAIEJ puts Imperial Western Products, Vincent R. Whittaker, Bill Trawick and Joseph Gravanda on notice that they are the persons responsible for the violations described above. If additional persons are subsequently identified as also being responsible for the violations set forth above, CCAIEJ puts Imperial Western Products, Vincent R. Whittaker, Bill Trawick and Joseph Gravanda on notice that it intends to include those persons in this action.

IV. Name And Address Of Noticing Parties.

The name, address and telephone number of CCAIEJ is as follows:

Penny Newman
Executive Director

Center for Community Action and Environmental Justice
P.O. Box 33124
Jurupa Valley, CA 92519
Tel. (951) 360-8451

V. Counsel.

CCAIEJ has retained counsel to represent it in this matter. Please direct all communications to:

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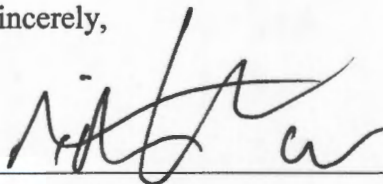
VI. Penalties.

Pursuant to Section 309(d) of the Act (33 U.S.C. § 1319(d)) and the Adjustment of Civil Monetary Penalties for Inflation (40 C.F.R. § 19.4) each separate violation of the Act subjects Imperial Western to a penalty of up to \$37,500 per day per violation. In addition to civil penalties, CCAIEJ will seek injunctive relief preventing further violations of the Act pursuant to Sections 505(a) and (d) (33 U.S.C. §1365(a) and (d)) and such other relief as permitted by law. Lastly, Section 505(d) of the Act (33 U.S.C. § 1365(d)), permits prevailing parties to recover costs and fees, including attorneys' fees.

CCAIEJ believes this Notice of Violations and Intent to File Suit sufficiently states grounds for filing suit. CCAIEJ intends to file a citizen suit under Section 505(a) of the Act against Imperial Western and its agents for the above-referenced violations upon the expiration of the 60-day notice period. However, during the 60-day notice period, CCAIEJ would be willing to discuss effective remedies for the violations noted in this letter. If you wish to pursue such discussions in the absence of litigation, CCAIEJ suggests that you initiate those discussions within the next 20 days so that they may be completed before the end of the 60-day notice period.

CCA EJ does not intend to delay the filing of a complaint in federal court if discussions are continuing when that period ends.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gideon Kracov', written over a horizontal line.

Gideon Kracov

The Law Office of Gideon Kracov
Attorneys for Center for Community Action and
Environmental Justice

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*Served via Certified Mail, Return Receipt Requested.

ATTACHMENT A

Rain Dates, Imperial Western, Mira Loma, California

11/28/2009	12/7/2009	12/12/2009
12/13/2009	1/17/2010	1/18/2010
1/19/2010	1/20/2010	1/21/2010
1/22/2010	1/26/2010	2/5/2010
2/6/2010	2/09/2010	2/22/2010
2/27/2010	3/04/2010	3/06/2010
4/05/2010	4/12/2010	4/20/2010
4/22/2010	11/08/2010	11/20/2010
11/21/2010	11/24/2010	12/05/2010
12/06/2010	12/16/2010	12/18/2010
12/19/2010	12/20/2010	12/21/2010
12/22/2010	12/25/2010	12/29/2010
1/02/2011	1/03/2011	1/30/2011
2/16/2011	2/18/2011	2/19/2011
2/25/2011	2/26/2011	3/20/2011
3/21/2011	3/23/2011	4/08/2011
5/18/2011	7/31/2011	10/05/2011
11/04/2011	11/06/2011	11/12/2011
11/20/2011	12/12/2011	1/21/2012
1/23/2012	2/15/2012	2/27/2012
3/17/2012	3/18/2012	4/11/2012
4/13/2012	4/25/2012	4/26/2012

8/30/2012	10/11/2012	11/08/2012
12/12/2012	12/13/2012	12/24/2012
12/29/2012	1/24/2013	1/25/2013
2/08/2013	2/19/2013	3/08/2013
3/09/2013	5/06/2013	7/20/2013
10/09/2013	11/21/2013	12/07/2013
2/06/2014	2/28/2014	3/01/2014
4/01/2014	4/02/2014	4/25/2014
11/01/2014	11/2/2014	12/1/2014
12/2/2014	12/3/2014	